

EXHIBIT W

SENTENCING MEMORANDUM ON BEHALF OF CAMERON COLLINS

United States v. Christopher Collins, et al.
No. S1 18-CR-567 (VSB)

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Court Bars Recidivist from Serving in Senior Positions in Public Companies

Litigation Release No. 24244 / August 23, 2018***Securities and Exchange Commission v. Gary S. Williky, No.
15-civ-357 (S.D. Ind. filed Mar. 2, 2015)***

A court has barred a repeat securities law violator from serving as an officer or director of publicly-traded companies for [perpetuating an illegal market manipulation and insider trading scheme](#) that involved Indiana-based company Imperial Petroleum, Inc., which purported to be in the renewable fuel production business.

► [Opinion Granting SEC's
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The final judgment, entered on August 3, 2018 by a federal court in Indianapolis, Indiana, permanently prohibits Williky, a former investor relations consultant for Imperial, from violating the antifraud provisions of Section 17(a) of the Securities Act of 1933 and Section 10(b) of the Securities Exchange Act of 1934 and Rule 10b-5 thereunder, the anti-manipulation provisions of Section 9(a)(1) of the Exchange Act, and the beneficial owner provisions of Section 13(d) of the Exchange Act and Rule 13d-1 thereunder. In addition to the bar, the court also ordered Williky to pay civil penalties of \$1,746,434 and disgorgement plus interest of \$1,037,811, for a total of \$2,784,245. The court's entry of judgment ends the SEC's litigation in its entirety.

The SEC's case was handled by Benjamin Hanauer, Timothy Leiman, Anne Graber Blazek, and Scott J. Hlavacek of the Chicago Regional Office. The SEC appreciates the assistance of the FBI and the U.S. Attorney's Office for the Southern District of Indiana.

Modified: August 23, 2018